

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
INTEGRATED HEALTH SERVICES, INC., <i>et al</i> ,)	Case No. 00-389 (MFW)
)	
Debtors.)	
)	(Jointly Administered)
)	
IHS LIQUIDATING, LLC,)	
)	
Plaintiff,)	
v.)	Civil Action No. 05-376 GMS)
)	
ACE INDEMNITY INSURANCE COMPANY)	
f/k/a INDEMNITY INSURANCE COMPANY)	
OF NORTH AMERICA,)	
)	
Defendant.)	
)	
)	
IHS LIQUIDATING, LLC,)	
)	
Third-Party Plaintiff,)	
v.)	
)	
NATIONAL UNION FIRE INSURANCE)	
OF PITTSBURGH, PA,)	
GENERAL STAR INDEMNITY COMPANY)	
and ACE INDEMNITY INSURANCE COMPANY)	
f/k/a INDEMNITY INSURANCE COMPANY)	
OF NORTH AMERICA)	
)	
Third-Party Defendants.)	
)	

NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)

PLEASE TAKE NOTICE that third-Party Defendant NATIONAL UNION FIRE INSURANCE OF PITTSBURGH, PA, by and through undersigned counsel, will take the deposition upon oral examination pursuant to Fed. R. Civ. P. 30(b)(6) of ACE INDEMNITY

INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY (“ACE” or “IICNA”) on February 26, 2007, beginning at 11 a.m. (EST) and continuing until completed. Pursuant to Fed. R. Civ. P. 30(b)(6), IICNA shall designate and produce at the deposition the person with the most knowledge about the underwriting of IICNA Policy No. XLXG1 9524139. The deposition will be held at the offices of Cross & Simon, LLC, 913 N. Market Street, 11th Floor, Wilmington, Delaware 19801, or at such place as the parties mutually agree. The deposition shall be recorded by stenographic means.

Dated: January 26, 2007
Wilmington, Delaware

CROSS & SIMON, LLC

By: /s/ Christopher P. Simon
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-and-

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